

IN THE SUPREME COURT OF FLORIDA

Case No. SC2025-1325

In re:

Petition of Mario Mirabal for All Writs Relief under Article V, § 3(b)(8),
Florida Constitution

NOTICE OF FEDERAL SUPREMACY AND PRESERVATION OF
OBJECTION TO PENDING ACTIONS BEFORE JUDGE ENRIQUEZ
INVOLVING FEDERALLY-NAMED PARTIES AND ACTIVE
FEDERAL PROCEEDINGS

COMES NOW Petitioner, Mario Mirabal, and respectfully submits this Notice to inform this Court of an active jurisdictional conflict arising from proceedings pending before the Honorable Judge Javier Enriquez in Case No. 2018-018704-CA-01 (11th Judicial Circuit, Miami-Dade County).

This Notice supplements and reinforces the previously filed Notice of Deprivation of Rights regarding Judge Simon (filed October 6, 2025), and is submitted solely to preserve the record, document federal conflict, and ensure consistency in this Court's ongoing consideration of Petitioner's original petition for protective oversight.

I. FEDERAL ACTIONS AND SUBJECT MATTER CONFLICT

Petitioner is currently litigating active civil proceedings in the United States

District Court for the Southern District of New York, including:

Mirabal v. Deutsche Bank National Trust Company et al., Case No. 1:25-cv-07423-JPC-SN (collateral challenge to void judgment);

Mirabal v. KP Investments Miami, LLC et al., Case No. 1:25-cv-07418-LJL (§ 1983 civil rights);

Mirabal v. Deutsche Bank and KP Investments et al., Case No. 1:25-cv-07419-VEC (RICO claims).

All state court litigants actively appearing before Judge Enriquez — including Deutsche Bank, KP Investments Miami, LLC, and their respective attorneys — are named defendants in the above federal cases and are currently under federal judicial review.

Petitioner has also filed a detailed forensic record in Florida court exposing material inconsistencies, fraudulent assignments, and pooling and servicing agreement violations that void the foreclosure judgment being relied upon by Deutsche Bank. These claims are currently before Judge Enriquez under Petitioner's pending Rule 1.540(d) Motion and related filings.

II. SUPREMACY CLAUSE, PRESERVATION OF RIGHTS, AND FEDERAL NOTICE

On October 6, 2025, Petitioner filed the following protective measures:

DEFENDANT’S NOTICE OF FEDERAL CONFLICT, PRESERVATION
OF JURISDICTIONAL OBJECTION, AND LIMITED CONDITIONAL
OBJECTION TO CONTINUED PROSECUTION BY FEDERALLY-
NAMED PARTIES AND THEIR COUNSEL in Case No. 2018-018704-
CA-01;

Second Emergency Supplemental Notice in the U.S. District Court for the
Southern District of New York, Case No. 1:25-cv-07423-JPC-SN, alerting
the Court to the procedural threat posed by Judge Enriquez’s docket and
requesting protective relief.

Petitioner respectfully preserves all rights under the U.S. Constitution and
Florida Constitution, including Supremacy Clause protections and the right
to be free from retaliatory litigation by parties actively under federal review.

III. REQUEST FOR ADMINISTRATIVE REVIEW AND PROTECTION

Petitioner respectfully requests that this Court:

Take judicial notice of the SDNY filing and state-level jurisdictional
objection entered October 6, 2025;

Monitor Case No. 2018-018704-CA-01 to ensure that no adverse
proceedings are initiated or resumed while federal judicial review remains
active;

Preserve Petitioner’s right to pursue supervisory relief in this Court should
Judge Enriquez proceed contrary to constitutional due process and federal

deference.

No action is requested from this Court at this time beyond the acknowledgment of this notice and the preservation of Petitioner's record.

Respectfully submitted,

/s/ Mario Mirabal

Mario Mirabal

Petitioner (Pro Se)

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October 6, 2025